



NATURAL RESOURCES DEFENSE COUNCIL

VIA FACSIMILE 202-772-9749

July 8, 2004

David Reese
Office of Safety and Environment
Department of Homeland Security
Washington, DC 20528

Re: Proposed NEPA Directive – Request for Extension of Public Comment Period
for an additional 30 days

Dear Mr. Reese:

We are writing on behalf of the one million members and activists of the Natural Resources Defense Council (NRDC) to request a 30-day extension of the public comment period regarding the Department of Homeland Security's (DHS's) proposed directive containing policy and procedures for implementing the National Environmental Policy Act (NEPA). 69 Fed. Reg. 33043 (June 14, 2004).

Given the sweeping nature of the activities affected by the directive, the initial 30 days provided for comment are insufficient to provide a full record of the public concerns and ideas regarding the proposed directive. Numerous communities across the country could be affected by DHS activities. More than 30 days is necessary to inform potentially affected citizens of the directive and to give them the opportunity to evaluate the proposal.

In addition, more than 30 days is necessary to gain access to and fully evaluate the administrative record upon which DHS has based the numerous categorical exclusions proposed. DHS has made it impossible to review the record within the initial 30-day comment period by requiring NRDC to submit a Freedom of Information Act request to obtain it.

Thank you for consideration of this request.

Sincerely,

Sharon Buccino
Sharon Buccino
Senior Attorney

Max Wilson
Max Wilson
Legal Intern

www.nrdc.org

1200 New York Avenue, NW, Suite 400
Washington, DC 20005
TEL 202 289-6868 FAX 202 289-1060

NEW YORK • LOS ANGELES • SAN FRANCISCO